

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF PAUL KROEGER IN SUPPORT OF
PLAINTIFF HEADWATER RESEARCH LLC'S OPPOSITION TO DEFENDANTS'
OPPOSED MOTION TO AMEND ITS ANSWER TO ADD AN IMPROPER
INVENTORSHIP DEFENSE**

I, Paul Kroeger, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff's Response to Samsung's Opposed Motion to Amend its Answer to Add an Improper Inventorship Defense. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.
2. Attached as Exhibit A is a true and correct copy of excerpts of the February 7, 2025 deposition transcript of Vien-Phuong Nguyen.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 24, 2025, at Los Angeles, California.

/s/ Paul Kroeger
Paul Kroeger

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2025, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3).

/s/ Paul Kroeger
Paul Kroeger